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PhD, and Kimberly Wall*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GABRIELLE CLARK, individually and as parent
and guardian of WILLIAM CLARK, and
WILLIAM CLARK, individually,

Plaintiffs,

vs.

STATE PUBLIC CHARTER SCHOOL
AUTHORITY, DEMOCRACY PREP PUBLIC
SCHOOLS, DEMOCRACY PREP PUBLIC
SCHOOLS, INC., DEMOCRACY PREP at the
AGASSI CAMPUS, DEMOCRACY PREP
NEVADA LLC, SCHOOL BOARD of Democracy
Prep at the Agassi Campus, NATASHA TRIVERS,

CASE NO.: 2:20-cv-02324-APG-VCF

**STIPULATION TO VACATE
PRELIMINARY INJUNCTION HEARING**

1 individually and in her official capacity as
 2 Superintendent and CEO, ADAM JOHNSON,
 3 individually and in his official capacity as Executive
 4 Director and Principal, KATHRYN BASS,
 5 individually and in her capacity as Teacher,
 6 JOSEPH MORGAN, individually and in his official
 7 capacity as Board Chair, KIMBERLY WALL,
 8 individually and in her capacity as assistant
 9 superintendent, and John & Jane Does 1-20,

10 Defendants.

11 Plaintiffs Gabrielle Clark and William Clark, by and through their counsel of record MARQUIS
 12 AURBACH COFFING, and Defendants Democracy Prep Public Schools, Democracy Prep Public
 13 Schools, Inc., Democracy Prep at the Agassi Campus, Democracy Prep Nevada LLC, School Board of
 14 Democracy Prep at the Agassi Campus, Natasha Trivers, Adam Johnson, Kathryn Bass, Joseph Morgan,
 15 PhD, and Kimberly Wall (the “Democracy Prep Defendants”), by and through their counsel,
 16 GREENBERG TRAUIG, LLP, and WILMER CUTLER PICKERING HALE AND DORR LLP,
 17 hereby request that the Court vacate the upcoming preliminary injunction hearing.

18 The parties state as follows:

19 1. On April 9, 2021, Defendants notified Plaintiffs and the Court that “Defendants have
 20 expunged William Clark’s first and second trimester Sociology of Change grades and updated his
 21 transcript to reflect the same.” ECF 93 & ECF 93-1 (Ltr. From A. Johnson to W. Clark). “Defendants
 22 have also excused William from completing the Sociology of Change course as a graduation
 23 requirement, such that he will remain on track to graduate in May 2021 with the rest of his senior cohort
 24 so long as he otherwise remains in good academic standing and fulfills all other graduation
 25 requirements.” ECF 93 & ECF 93-1 (Ltr. From A. Johnson to W. Clark).

26 2. In light of this intervening development, the parties stipulate that Defendants have
 27 provided Plaintiff William Clark with the preliminary injunctive relief he seeks.

28 3. Accordingly, the parties stipulate that the status conference and preliminary injunction
 hearing scheduled for April 12 and 14, 2021 be vacated.

4. The parties further stipulate that all pending discovery obligations directed toward the
 hearing, including depositions, be vacated.

5. The parties further stipulate that the pending motion for a preliminary injunction is withdrawn.

IT IS SO STIPULATED.

DATED this 9th day of April, 2021.

GREENBERG TRAURIG, LLP

MARQUIS AURBACH COFFING

/s/Kara B. Hendricks

/s/Susan E. Gillespie

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Attorney for State Public Charter School Authority

ORDER

In consideration of the stipulation by the parties, and with cause appearing:

IT IS HEREBY ORDERED that any hearings currently scheduled shall be vacated;

IT IS HEREBY ORDERED that any pending discovery deadlines directed toward the hearing shall be vacated;

IT IS FURTHER ORDERED that the pending motion for a preliminary injunction is withdrawn.

IT IS SO ORDERED.

DATED this 12th day of April, 2021.


UNITED STATES DISTRICT JUDGE